

Honorable John C. Coughenour

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SHANE COLLINS,

Plaintiff,

vs.

AMERICAN BANKERS INSURANCE
COMPANY OF FLORIDA, a Florida
corporation,

Defendant.

No. 2:23-CV-01959-JCC

**STIPULATED MOTION TO EXTEND
DEADLINES FOR SUMMARY
JUDGMENT RESPONSE AND REPLY
DEADLINE**

**NOTED ON MOTION CALENDAR:
DECEMBER 5, 2024**

STIPULATED MOTION

Defendant American Bankers Insurance Company of Florida and Plaintiff Shane Collins jointly move the Court to extend the deadlines for response and reply briefing on Plaintiff's Motion for Partial Summary Judgment. Dkt. 21. The parties have scheduled a mediation for December 9, 2024, and wish to defer the cost of further briefing prior to attempting to settle their dispute. The parties therefore jointly request that the response deadline Plaintiff's motion be extended to December 23, 2024, and that any reply papers be filed on or before January 3, 2025. Accordingly, the parties request the motion be re-noted to January 3, 2025.

1 It is so moved and stipulated:

2 DATED this 5th day of December, 2024
3 LAW OFFICE OF WILLIAM E. PIERSON,
JR. P.C.

DATED this 5th day of December, 2024
FORSBERG & UMLAUF, P.S.

4 s/ William E. Pierson, (electronic permission)
5 Mr. William E. Pierson, Jr.. WSBA #13619
6 Attorney for Plaintiff

s/ Daniel L. Syhre
Daniel L. Syhre, WSBA #34158
Attorney for Defendants

7 **ORDER**

8 THIS MATTER having come on before the above-entitled court on the above stipulation
9 of the parties through their counsel of record, now, therefore, it is hereby ORDERED that
10 Defendant's response to Plaintiff's Motion for Partial Summary Judgment (Dkt. 21) shall be filed
11 on or before December 23, 2024, and Plaintiff's reply be filed on or before January 3, 2025.
12 Plaintiff's Motion of Partial Summary Judgment is re-noted to January 3, 2025.

13 DONE this 5th day of December, 2024.

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UNITED STATES DISTRICT JUDGE

17 *Presented by:*

18 FORSBERG & UMLAUF, P.S.

19
20 s/ Daniel L. Syhre
Daniel L. Syhre, WSBA #34158
21 *Attorneys for Defendant*

22
23 LAW OFFICE OF WILLIAM E. PIERSON, JR. P.C.

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2 s/ William E. Pierson, (electronic permission)
3 Mr. William E. Pierson, Jr.. WSBA #13619
4 *Attorney for Plaintiff*
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STIPULATED MOTION TO EXTEND DEADLINES FOR SUMMARY
JUDGMENT RESPONSE AND REPLY DEADLINE – 3
Cause No.: 2:23-cv-01959-JCC

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